## UNITED STATES DISTRICT COURT DISTRICT OF NEVADA

Case No. 3:23-CV-000007-LRH

HEATHER SHEREE SANDERS,

Plaintiffs,

VS.

YOGA UNION, INC., et al.,

Defendants.

## ORDER GRANTING UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO COMPLAINT

Defendants, YOGA UNION, INC., YOGA UNIFIED, INC., NEIL HACKMAN a/k/a RAVI SINGH, and JUDY WEAVER, by and through undersigned counsel, hereby move for an <u>unopposed</u> 20-day extension of time to respond to Plaintiff, HEATHER SHEREE SANDERS', complaint (ECF No. 1).

- 1. This is an eleven-count complaint for an alleged violation of the Fair Labor Standards Act (the "FLSA") and other state-law causes of action.
- 2. On January 5, 2023, the complaint was filed. Each Defendant was served on or about January 16, 2023, making the responses due **today**, February 6, 2023, by undersigned's calculation.
- 3. Defendants need more time for a detailed review of the pleading and to meet and confer with Plaintiff's counsel on the same. As mentioned, the complaint is 11 counts and contains nearly 180 paragraphs of allegations. Defendant needs more time to discuss the allegations and counts with his clients.
  - 4. Furthermore, Defendants have retained a Florida-based counsel to represent their

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interests in this lawsuit. The formal agreement with those counsels has recently been finalized and

they need to file formal motions to appear pro hac vice.

5. This motion is not made for the purposes of delay, but simply to allow Defendants'

Florida-based counsel time to appear in this action, review the complaint with their clients, and to

properly meet-and-confer regarding any issues that may arise during their review of the complaint.

6. No party will be prejudiced by this extension, as it is unopposed.

7. Defendants therefore request an extension of time of 20 days to respond to the

complaint, making their responsive document due on or before February 27, 2023. This is

Defendants' first request for an extension of time to respond to the complaint.

WHEREFORE, Defendants respectfully request that this Court grant its motion for an

extension of time to respond to the complaint, making their responsive document due on or before

February 27, 2023.

**Local Rule 1-3(f) Certification** 

Undersigned counsel hereby certifies that the parties have engaged in the meet-and-confer

requirement imposed by the Local Rules. Undersigned counsel certifies that Defendants' Florida-

based counsel conferred with Plaintiff's counsel by email on or about February 3, 2023, regarding

the issues raised in this motion. Undersigned counsel was copied on said email. Plaintiff's counsel

**does not object** to the relief requested herein.

Dated: February 6, 2023

s/ Adam Yowell

Adam K. Yowell

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It is so Ordered:

UNITED STATES MAGISTRATE JUDGE

DATED:

February 6, 2023